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AZ CORP COMMISSION
DOCKET CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

KRISTIN K. MAYES, CHAIRMAN
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

Arizona Corporation Commission

DOCKETED

JUL 31 2009



IN THE MATTER OF THE
APPLICATION OF WICKENBURG
RANCH WATER, LLC (FORMERLY
CDC WICKENBURG WATER, LLC)
FOR APPROVAL OF A RATE
ADJUSTMENT

DOCKET NO. W-03994A-07-0657

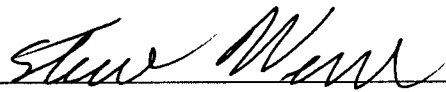
**NOTICE OF COMPLIANCE
ACTION REGARDING BEST
MANAGEMENT PRACTICES**

Pursuant to Order and Opinion Decision No. 70747, on May 11, 2009,
Wickenburg Ranch Water, LLC ("Company") submitted Best Management Practices
(BMPs) it selected for implementation. Thereafter, the Arizona Corporation Commission
Staff requested additional information and suggested that the Company might revise its
selections. Accordingly, the Company hereby submits an amended list of BMPs selected
for implementation by the Company set forth in Attachment 1.

1 Although the Company is complying with the Order's terms regarding the BMP
2 conditions, the Company has filed objections to remove these provisions from the Order
3 and a rehearing proceeding is underway. Accordingly, the Company is filing this
4 documentation with the understanding that the objections set forth in the Company's
5 Application for Rehearing are incorporated herein. If the objections to the BMP
6 requirements are granted, then this filing will be ineffective and unenforceable.
7

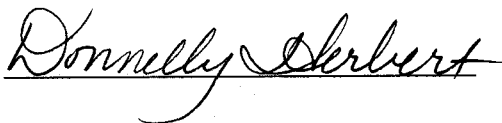
8
9 RESPECTFULLY SUBMITTED this 31st day of July, 2009.

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11 **MOYES SELLERS & SIMS**

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13 
14 Steve Wene

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16 Original and 13 copies of the foregoing
17 filed this 31st day of July, 2009, with:

18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007

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ATTACHMENT 1

IMPLEMENTATION OF 10 BEST MANAGEMENT PRACTICES PROGRAMS

(2.3) *New homeowner Landscape Information*

The Company will make low water use landscape information packets available to all new owners of newly constructed homes, either through direct distribution (mail or delivery) or through delivery by the home builder. The Company will also notify new owners of existing homes (resale) that information on low water use landscaping is available and will provide such information on request.

(3.6) *Customer High Water-Use Inquiry Resolution*

The Company will assign a designee(s) to assist customers with their high water-use complaints. The program will include site inspection when warranted to discover the cause of an increase in a customer's water bill. The Company will follow up in some way on every customer inquiry and keep a record of inquiries and follow-up activities.

(3.7) *Customer High Water Use Notification*

The Company will monitor customers for high water use, as determined by comparing the customers' previous water usage and water use by other similarly situated customers. The Company will contact any high water use customers via telephone, by email, by mail or in person and will provide such customers information on water savings devices, techniques, and rebate programs as appropriate. The type of notification and the criteria used for determining which customers are notified will be recorded in writing.

(3.8) *Water Waste Investigations and Information*

The Company will assign a designee(s) to assist customers with water waste complaints. A complaint investigation would typically include a site inspection and some type of follow-up action, such as education of the customer to prevent water waste. The Company will follow-up in some way on every water waste complaint and keep a record of complaints and follow-up activities.

(4.1) *Leak Detection Program*

The Company will implement a systematic evaluation of its water distribution system to identify and fix leaks. The Company will implement this program throughout its service area unless the Company reasonably concludes that targeting certain portions of their water service area is likely to yield the highest potential water savings.

(4.2) *Meter Repair and/or Replacement Program*

The Company will implement a program to systematically assess the meters in its water service area to identify under-registering meters and to repair or replace them.

(5.2) Water System Tampering

Pursuant to A.R.S. § 40-492, *et al.*, the Company may bring an action for damages or to enjoin any activity against a person who: (1) makes a connection or reconnection with property owned or used by the Company to provide utility service without the Company's authorization or consent; (2) prevents a Company meter or other device used to determine the charge for utility services from accurately performing its measuring function; (3) tampers with property owned or used by the Company; or (4) uses or receives the Company's services without the authorization or consent of the Company's and knows or has reason to know of the unlawful diversion, tampering or connection. If the Company's action is successful, the Company may recover as damages three times the amount of actual damages.

(7.3) Evaluation of New and Emerging Technologies and Practices

The Company will conduct a systematic evaluation of conservation measures already implemented as well as state of the art water conservation technologies and techniques. Each year the Company will research and review new technologies and practices and draft a conservation technology and practice report stating the objectives of the evaluation, methods used to conduct the evaluation, and results of the investigation.

(7.5) Implementation of Smart Irrigation Technology

The Company will conduct a systematic evaluation of smart irrigation technology already implemented as well as new related technologies. The Company will draft an annual report briefly describing the project location, implementation methods, and estimates of irrigation efficiency or water savings, as appropriate.